

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

15-5117
(C.A. No. 13-0556)

NATIONAL SECURITY COUNSELORS, et al.

Appellants,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

Appellee.

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE MOTION FOR SUMMARY AFFIRMANCE**

Appellee, through undersigned counsel, respectfully moves for an extension of approximately 30 days to, and including, July 13, 2015, to file a motion for summary affirmance in this appeal. Pursuant to the Order dated April 28, 2015, the deadline for Appellee to file a dispositive motion is June 12, 2015. Counsel for Appellee has conferred with Appellants' counsel regarding this request, and counsel for Appellants has advised that Appellants consent to this request.

Good cause exists for this request. As a result of commitments in other matters, including a deadline of June 11, 2015, to file a motion for summary judgment in a matter pending in District Court, counsel has had limited ability to confer and consult with the client agency, prepare a motion for summary affirmance, and allow the motion to undergo the applicable review process before

filings with the Court by the existing deadline. In addition, undersigned counsel has a deadline of June 18, 2015 to file a dispositive motion in another matter in District Court, and has plans to be out of the office from June 26, 2015 to July 3, 2015. Accordingly, Appellee is seeking an extension of the current deadline for the filing of dispositive motions of approximately 30 days, from June 12, 2015, to, and including, July 13, 2015.

Conclusion

For the foregoing reasons, Appellee respectfully requests an extension of time to, and including, July 13, 2015, to file a motion for summary affirmance.

VINCENT H. COHEN, JR.
Acting United States Attorney

R. CRAIG LAWRENCE
Assistant United States Attorney

/s/ Jeremy S. Simon
JEREMY S. SIMON
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of June, 2015, the foregoing Consent Motion for Extension of Time to File Motion for Summary Affirmance has been served through the Court's electronic filing system

/s/ Jeremy S. Simon _____
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